

**REMARKS**

Claims 1, 3-16 and 18-28 are pending in this application. By this Amendment, claims 1, 14 and 16 are amended. No new matter is added.

**I. Personal Interview**

The courtesies extended to Applicants' representative by Examiner Paula during the interview held October 4, 2005, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

**II. Oath/Declaration**

The Office Action indicates that the current Oath/Declaration is defective for failing to include the mailing address of each inventor. Specifically, the mailing address of Dan Bloomberg is missing. A Substitute Declaration is submitted herewith providing the mailing address of Dan Bloomberg in accordance with 37 CFR §1.63(c) and 37 CFR §1.76. Accordingly, entry of the Declaration is respectfully requested.

**III. Claim Rejections under 35 U.S.C. §102**

Claims 1, 3-16 and 18-28 are rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent Application Publication 2003/0014445 to Formanek. The rejection is respectfully traversed.

Formanek fails to disclose each and every feature recited in the rejected claims. For example, Formanek fails to disclose a method of converting a document in a page-image format into a form suitable for an arbitrarily sized display, comprising in sequential order: deconstructing a document in a page image format; synthesizing the deconstructed document into an intermediate data structure; and distilling the intermediate data structure for redisplay in a format usable for an arbitrarily sized display, wherein deconstructing a document in a

page image format includes: identifying text image areas and non-text image areas of the document; locating and isolating text image areas and non-text image areas; processing the isolated text image areas and non-text image areas into text line regions and layout properties; processing located text line regions into segmented image elements; locating and labeling segmented image elements; and compressing the segmented image elements into token-based image elements, as recited in claim 1 or the corresponding feature of independent claims 14 and 16.

Formanek discloses a document reflowing technique whereby document images are transformed into alternate document images that fit within a given display width and/or are scaled to various sizes (paragraph [0002]). In the document reflowing technique disclosed in Formanek, an electronic document file is first converted or rasterized into an electronic image representation such as a bit map. If the document is already in an electronic format such as Adobe PDF, it can be converted into an electronic image using commonly available software (see paragraph [0028]; and Fig. 2).

Once the electronic document is in an image format, page decomposition is performed to identify the block positions of various text regions and graphical elements (paragraph [0029]; Fig. 2). Formanek discloses in a more detailed explanation that page decomposition is disclosed with respect to Figs. 3a and 3b. Thus, Formanek clearly discloses, with reference to the flowchart at Fig. 2, that an electronic document is first converted into an electronic image and then decomposed.

In contrast, rejected claim 1 discloses deconstructing a document in a page image format and then synthesizing the deconstructed document into an intermediate data structure. Therefore, claim 1 clearly indicates that the deconstructing step occurs prior to the synthesizing step because the synthesizing step includes synthesizing the deconstructed

document. As recited at paragraph [0017] of the specification of this application, deconstruction includes both physical, e.g., geometric, and logical, e.g., functional, segmentation of page images. "The segmented image elements may include blocks, lines, and/or words of text, and other segmented image elements. Thus, deconstruction, as defined at paragraph [0017] and in the pending claims, (i.e., claim 1) is the process of segmenting image elements that may include blocks, lines and/or words of text. This process corresponds to "page decomposition" as described in Formanek.

Furthermore, in the rejected claims it is the segmented image elements that are synthesized and converted into an intermediate data structure (see paragraph [0017] and at least claim 1 of this application). The intermediate data structure is defined in the specification of this application as a data structure that includes images of words in correct reading order and links to non-textural image elements. The intermediate data structure may for example be expressed in a variety of formats such as, for example, Open E-book XML, Adobe PDF, HTML, and/or XHTML, as well as other useful formats that are now available or may be developed in the future (see paragraph [0017]). In contrast, Formanek clearly discloses the document file being converted into an electronic image, as in a format such as Adobe PDF, prior to segmentation (i.e., deconstruction) (see paragraphs [0028] and [0029]). Thus, the interpretation of the steps of deconstructing a document in a page image format and synthesizing the deconstructed document into an intermediate data structure in the Office Action is incorrect and does not comport with the definitions of those terms as recited in the claims and in the specification of this application.

For example, it is alleged in the Office Action that Formanek discloses deconstructing a document in a page image format at paragraph [0029]. The Office Action then goes on to allege that Formanek discloses that as a result of decomposition the document is divided into

image and text blocks-synthesizing the deconstructed document into an intermediate data structure at paragraph [0032], Fig. 3b. However, as clearly recited in Fig. 29, once the electronic document is in an image format as a bit map, page decomposition is performed to identify block positions and that a more detailed explanation of that page decomposition is shown in Figs. 3a and 3b. In other words, Formanek does not decompose the page, i.e., segment image elements, until after the document has been converted into an electronic image representation (e.g., Adobe PDF) or such as a bit map, i.e., synthesizing into an intermediate data structure. Therefore, Formanek does not disclose each and every feature as recited in the rejected claims.

Anticipation requires the presence in a single prior art disclosure of all elements of a claimed invention arranged as in the claim. A prior art disclosure that "almost" meets the standard does not anticipate. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 1548 (Fed. Cir. 1983). As Formanek does not disclose each and every feature as recited in the rejected claims, Formanek cannot anticipate claims 1, 3-16 and 18-28.

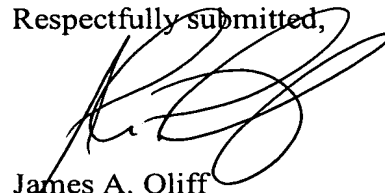
Furthermore, it is improper for the recited claim terms to be interpreted in a manner inconsistent with the use of the term in the claim and in the specification. Claims yet unpatented are to be given their broadest reasonable interpretation consistent with the specification during examination of a patent application. In re Prater, 415 F.2d 1393 (1969). Thus, when interpreting the claims in light of their use within the claim, and in the specification, Formanek does not disclose each of the recited steps and therefore fails to disclose each and every feature recited in the rejected claims. Accordingly, withdrawal of the rejection of claims 1, 3-16 and 18-28 under 35 U.S.C. §102(e) is respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:  
Substitute Declaration

JAO:JWF/lbg

Date: October 6, 2005

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